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Attorneys for Plaintiffs and the Proposed Classes

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

EVANGELINE RED and RACHEL
WHITT, on Behalf of Themselves and All
Others Similarly Situated,

Plaintiffs,

v.

KRAFT FOODS INC., KRAFT FOODS
NORTH AMERICA, AND KRAFT
FOODS GLOBAL, INC.,

Defendants.

Case No. 2:10-cv-01028 GW(AGR_x)

Pleading Type: Class Action

**NOTICE OF MOTION AND MOTION
TO COMPEL RESPONSES TO
REQUESTS FOR PRODUCTION AND
INTERROGATORIES AND PRODUCE
WITNESSES PURSUANT TO RULE
30(B)(6).**

Judge: The Hon. Alicia G. Rosenberg

Hearing: July 12, 2011 at 10:00am

Location: Courtroom D

TO ALL PARTIES AND THEIR COUNSEL OF RECORD:

PLEASE TAKE NOTICE THAT on July 12, 2011 at 10:00 am or as soon thereafter as the matter may be heard, in the courtroom of the Honorable Alicia G. Rosenberg, located at 312 N. Spring St., Los Angeles, CA 90012, Courtroom D, Plaintiffs will and hereby do move this Court to compel:

- Discovery responses based on the full putative class period (January 1, 2000 to the present);
- Discovery responses based on the full geographic scope of the putative nationwide class;
- Responses to Plaintiffs' Interrogatories Nos. 1-6 and 11;
- Responses to Requests for Production Nos. 2-4, 12-13, 16, 23, 30-34, 36, 44-54, and 59; and
- Production of witnesses pursuant to Rule 30(b)(6) for Topics 2, 3-6, and 8-11, identified in Plaintiffs' Rule 30(b)(6) Notice.

Plaintiffs' motion is based on this Notice of Motion, the Joint Stipulation filed concurrently herewith, the accompanying Gregory S. Weston and the Exhibits attached thereto, all other pleadings and papers on file in this action, any matters of which this Court may take judicial notice, and such further evidence and argument as may be presented at or before the hearing on this matter.

Pursuant to Local Rule 37-1, the parties met and conferred on the matters in this Motion on May 10, 2011.

DATED: June 15, 2011

Respectfully Submitted,

/s/Gregory S. Weston
Gregory S. Weston

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